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9  
10 IN THE UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF CALIFORNIA

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13  
14 UNITED STATES OF AMERICA,

15 Plaintiff,

v.

16 GABRIELLA SANTIBANEZ AND  
17 LISA HAZARD,

18 Defendant.

19 CASE NO. 2:22-cr-00235 WBS

20 STIPULATION AND ~~PROPOSED~~  
21 PROTECTIVE ORDER RE:  
22 DISSEMINATION OF DISCOVERY  
23 DOCUMENTS CONTAINING  
24 PERSONAL IDENTIFYING  
INFORMATION AND MEDICAL  
RECORDS

25 IT IS HEREBY STIPULATED AND AGREED among the parties that the documents  
26 provided as discovery in this case to defense counsel for Gabriella Santibanez and Lisa Hazard  
27 are subject to a Protective Order.

28 The parties agree that discovery in this case contains “Protected Information,” which is  
defined here as including patient and employee names, names of minors, medical records,  
diagnoses, social security numbers, Medicare numbers, tax records, driver’s license numbers,  
bank account numbers, financial account numbers, dates of birth, addresses, telephone numbers,  
and email addresses. The Protective Order signed in this case extends to all documents and other  
material provided.

29 By signing this Stipulation, defense counsel agrees that the Protected Information is being  
30 entrusted to counsel only for the purposes of representing Gabriella Santibanez and Lisa Hazard  
31 in this case. Further, defense counsel agrees not to share any documents that contain Protected  
32 Information with anyone other than his designated defense investigators, experts, and support

1 staff. Defense counsel may permit Gabriella Santibanez and Lisa Hazard to review the Protected  
2 Information and be aware of its contents, but Gabriella Santibanez and Lisa Hazard shall not be  
3 given control of the Protected Information or be provided any copies of the discovery. Any  
4 person receiving Protected Information or a copy of the Protected Information from counsel for  
5 Gabriella Santibanez and Lisa Hazard shall be bound by the same obligations as counsel and  
6 further may not give the Protected Information to anyone (except that the protected documents  
7 shall be returned to counsel).

8 Notwithstanding the foregoing, counsel for Gabriella Santibanez and Lisa Hazard will  
9 return all discovery to the United States or destroy it within five years of signing this Protective  
10 Order. If counsel needs to retain the discovery produced for a longer period of time, she will  
11 seek permission from the United States Attorney's Office. Gabriella Santibanez and Lisa Hazard  
12 will not retain any copies in any format of the discovery.

13 Any attorney work product produced will not be deemed a waiver of work product doctrine  
14 protection.

15 In the event that Gabriella Santibanez and Lisa Hazard substitutes counsel, undersigned  
16 defense counsel agrees to withhold these documents from new counsel unless and until  
17 substituted counsel agrees also to be bound by this order.

18 DATE: August 9, 2023 /s/ **SUMMER MCKEIVIER**  
19 Attorney for Gabriella Santibanez and Lisa Hazard

20 DATE: August 9, 2023 PHILLIP A. TALBERT  
21 United States Attorney

22 By: /s/LEE S. BICKLEY  
23 LEE S. BICKLEY  
24 Assistant U.S. Attorney

25 **IT IS SO ORDERED:**

26 DATED: August 10, 2023\_



27 THE HONORABLE JEREMY D. PETERSON  
28 UNITED STATES MAGISTRATE JUDGE